

# **EXHIBIT C**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re

MICHAEL R. MAEDER and  
KATHLEEN M. MAEDER,

Debtors.

Bk. No. 07-04644-MJK  
(Chapter 7)

AFFIDAVIT IN  
SUPPORT OF MOTION  
TO REOPEN CASE

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STATE OF NEW YORK    )  
                                  ) SS.:  
COUNTY OF ERIE        )

I, PAULETTE VOIT, being duly sworn, depose and say:

1. I am Office Manager of the Greater Niagara Frontier Council, Boy Scouts of America, Inc. (the "Boy Scouts"). I am familiar with the facts set forth herein.

2. Upon information and belief, Debtor Kathleen Maeder pled guilty in April 2004 to embezzling in excess of \$200,000 from the Boy Scouts between May 1993 and December 1993, while she was employed by the Boy Scouts.

3. As part of her sentencing, I understand that Debtor Kathleen Maeder agreed to pay restitution to the Boy Scouts. She currently owes over \$150,000 in restitution to the Boy Scouts.

4. I have been employed by the Boy Scouts since June 2001.  
During that time I have been responsible for opening all of the Boy Scouts' mail.

5. When Debtor Kathleen Maeder was employed with the Boy Scouts, the Boy Scouts were located at 401 Maryvale Drive, Buffalo, New York 14225.

6. In August 2006, more than two years after the Debtor's employment with the Boy Scouts ceased, the Boy Scouts moved to 2860 Genesee Street, Buffalo, New York 14225.

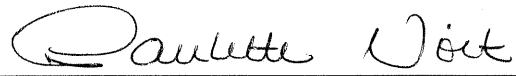
7. At the time of the move, the Boy Scouts filed a change of address form with the United States Postal Service ("USPS") requesting that all mail be delivered to their new address at 2860 Genesee Street, Buffalo, New York.

8. Mail was forwarded to the Boy Scouts for a year, until approximately August, 2007.

9. After the forwarding expired, from time to time, a mail-carrier at our old address would make efforts to send an item addressed to our old address to us at our new address.

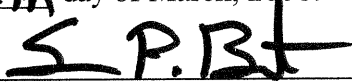
10. The Boy Scouts did not receive any notices with respect to the Debtors' bankruptcy filing until February 25, 2008, when it received the notice that the Debtors had been discharged. Until it received this notice, the Boy Scouts were unaware that the Debtors had filed bankruptcy.

11. The Boy Scouts received this notice of discharge on February 25, 2008 via regular mail even though it was addressed to the Boy Scouts' former address. I believe a mail-carrier for our old address caused it to be sent on to us. However, no prior notices in the Debtors' bankruptcy were delivered to us.



PAULETTE VOIT

Sworn to before me this  
12th day of March, 2008.



Notary Public

SEAN P. BEITER  
Notary Public, State of New York  
Qualified in Erie County  
Commission Expires December 11, 2009

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